



Assistant Secretary of the Army (Installations and Environment)



Sequencing Munitions Response Sites

Army Policies and Procedures

Environment, Energy Security & Sustainability (E²S²)

Symposium & Exhibition

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Topics

- Sequencing defined
- Scope of the Army's Program
- Overview of the Army's Policy for Sequencing Munitions Response Sites (MRS)
- Sequencing MRS based on relative priority
- Consideration of risk-plus factors
- Regulator and stakeholder involvement in the process
- Sequencing decision-making process
- Process for documenting sequencing decisions
- Sequencing Implementation Plans
- Status of sequencing at Army sites



Sequencing Defined

- Process outlined in the Munitions Response Site Prioritization Protocol (MRSPP)
- Prioritization and sequencing identified as separate and distinct steps
- Prioritization is “black and white”
- Sequencing allows for consideration of other factors of importance to regulators, stakeholders, and the Army



Scope of the Program

- The Army inventory includes MRS at:
 - Active installations
 - Base Realignment and Closure (BRAC) installations
 - Army National Guard (ARNG) installations
 - Formerly Used Defense Sites (FUDS)
- The ultimate goal of the Army's work at munitions response sites: address DoD contamination in a manner that is protective of human health and the environment.



Army MRS Sequencing Overview

- *Army Policy* currently being developed (expected release summer 2011).
- Policy describes procedures for:
 - Sequencing MRS for action based on relative priority
 - Consideration of other (risk-plus) factors
 - Involvement of regulators and stakeholders in the process
 - Documenting sequencing decisions
 - Developing program-specific MRS Sequencing Implementation Plans
- Policy expands upon three main concepts:
 - As a matter of policy, higher risk sites will be addressed first, but during sequencing, other (risk-plus) factors may be considered
 - Sequencing within each of the Army's restoration programs (Active, BRAC, ARNG, and FUDS) is independent of one another
 - Sequencing recommendations are based on a "bottom-up build" process



Sequencing Based on Relative Priority

- Based primarily on the MRS's relative priority as determined by application of the Munitions Response Site Prioritization Protocol (MRSP)
- Exceptions include, MRS:
 - With an alternative rating of "Evaluation Pending" will generally not be sequenced until the necessary degree of characterization is complete
 - At which a munitions response action (e.g., Time-Critical Removal Action) is ongoing will not be sequenced for additional actions until after the response is complete and the MRSP has been reapplied



Consideration of Risk-Plus Factors

- MRS sequencing primarily based on relative priorities.
- When considered, risk-plus factors will:
 - Be evaluated on an MRS-specific basis
 - Not change an MRS's relative priority

Risk-plus factors typically considered may include:

- Concerns expressed by regulators or stakeholders
- Cultural or social factors
- Economic factors
- Findings of health, safety, or ecological risk assessments
- Plans for development of the property in near term.
- A community's reuse requirements
- Protection of endangered species, critical habitat, the ecology and/or artifacts
- Specialized considerations of tribal trust lands
- Programmatic considerations
- Mission requirements
- Formal agreements with regulatory agencies
- Established program goals and/or initiatives
- Short-term and long-term ecological effects and environmental impacts



Risk Plus Factor Examples

Risk-Plus Factor	Example
Findings of Health, Safety, or Ecological Risk Assessments	<p>Picatinny Arsenal – Number of nearby on-site workers increased by mining company's operations</p> <p><u>Result – Sequenced ahead of MRS with higher relative priority</u></p>
Plans for Near-Term Property Development	<p>Fort Ord – Army has been working to speed transfers, and community desired to redevelop this highly desired location</p> <p><u>Result – Sequenced ahead of MRS with higher relative priority</u></p>
Community's Reuse Requirements	<p>Savannah Army Depot – Requires high cost CWM response action, but little community interest in property reuse</p> <p><u>Result – Sequenced after MRS with lower relative priority</u></p>
Programmatic Considerations (e.g., resource availability)	<p>Former Lowery Bombing Range (FLBR) –Army and state agreement resulted in substantial annual funding</p> <p><u>Result – Sequenced ahead of MRS with higher relative priority</u></p>



Regulator and Stakeholder Involvement

- DoD and Army policy is to ensure regulators and stakeholders are offered opportunities to participate early and throughout the sequencing process
- Formal involvement can occur during site-level (Technical Project Planning) meetings or at the Installation level (for Active/BRAC) or State level (for FUDS)
 - May occur during development of:
 - Installation Action Plan (IAP) for Active installations
 - BRAC Installation Action Plan (BIAP) for BRAC installations,
 - Statewide Management Action Plan (SMAP) or similar document for FUDS
 - Also may occur during local FUDS Forums or other routine meetings
- Notification is provided:
 - When the prioritization process begins
 - In the event Headquarters, Department of the Army (HQDA) or the Office of the Secretary of Defense (OSD) change a sequencing decision previously agreed upon in the Management Action Plan (MAP) equivalent (IAP, BIAP, or SMAP).



“Bottom-up” Build Process

Installations and US Army Corps of Engineers Districts (FUDS):

- Develop MRS-level sequencing recommendations based on MRS-specific technical issues, other factors, and regulatory and stakeholder input
- MRS-level sequencing recommendations reported through chain of command to the authority responsible for restoration activities

Program Execution Managers:

- US Army Environmental Command (USAEC) for active installations, HQDA Base Realignment and Closure Division (BRACD) for BRAC installations, ARNG Directorate for ARNG installations, and USACE for FUDS
- Develop sequencing recommendations for MRSs based on site level-input in the context of programmatic considerations.
- Provide justification for MRS sequenced according to risk-plus factors or when MRS sequencing is changed from what is reflected in the MAP equivalent.

HQDA:

- Review, validate, and approve all sequencing decisions through semi-annual management reviews and the Army’s Program Management Plan (PMP) review process.



MRS Specific Implementation Plans

- A Sequencing Implementation Plan (SIP) will be developed annually for each program area (Active, BRAC, ARNG, FUDS)
- Incorporated into the Program Management Plan for each restoration program, beginning with FY12
- The SIPs will include:
 - Detail on the sequencing process, unique to the particular program
 - Methods for evaluating and considering risk-plus factors
 - Methods for meeting documentation and reporting requirements
 - Process for involving regulators and stakeholders
 - Data management and documentation procedures



Documentation Procedures

- Sequencing-specific documentation includes the:
 - Sequencing decision
 - Regulator and Stakeholder input considered
 - Risk-plus factors considered (if applicable)
 - Rationale for sequencing an MRS of a lower relative priority before one of a higher relative priority (if applicable)
 - Input from regulators and stakeholders that may influence the sequencing of an MRS
- The Program Execution Managers are responsible for maintaining the required documentation



Documentation Procedures

- Sequencing documentation will reside in a number of different locations throughout the Army's restoration program structure:
 - Administrative Record / Information Repository
 - MAP or equivalent (IAP, BIAP, SMAP)
 - Army environmental database of record
 - Army Environmental Database – Restoration (AEDB-R)
 - FUDS Management Information System (FUDSMIS)
 - Upon deployment, all Army environmental data will reside in the Headquarters Army Environmental System (HQAES)
 - Program Management Plans (PMPs)
 - OSD's Knowledge-Based Corporate Reporting System (KBCRS)



Status of Sequencing?

- From one end of the spectrum to the other!
 - Active installations completed Site Inspections (SIs) in 2010, aggressively moving into Remedial Investigations (RIs)
 - BRAC has been engaging in munitions response activities for many years; extensively utilizing risk-plus factors to meet community reuse requirements
 - FUDS to complete SIs by 2014; very little funding for RIs
 - ARNG just beginning SI program
- Sequencing will continue to vary among the Army's restoration programs, both in approach and progress
- HQDA continues to work to bring consistency across the Army inventory in an effort to achieve the ultimate goal of addressing DoD contamination and protecting health and the environment



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Questions?